

12.02-4 Basis for Denial of a merchant mariner's document.

(a)No person who has ever been the user of a dangerous drug, addicted or not.... is eligible for a merchant mariner's document, unless he or she furnishes satisfactory evidence of suitability for service in the merchant marine.....

This requirement is harsh for experimental users who have never been convicted for a drug related offense and who admit to drug use that is more than 10 years from date of application. Requiring proof of rehabilitation prior to issuance of a MMD is extreme and an unnecessary expense for the mariner.

(c)each applicant must provide written disclosure of all prior convictions....

Provide for arrests only without court disposition. If a mariner is a fugitive or is awaiting a trial date (especially for a serious charge, such as murder) there is a loophole.

12.02-9 Application for documents

(a) *General.* The Coast Guard will not process an incomplete merchant mariner's document application.

Process should be replaced by "issue a credential based upon"

Define the word: "incomplete"